

WATER QUALITY ENVIRONMENTAL PERFORMANCE PARTNERSHIP AGREEMENT

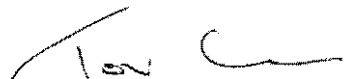
Calendar Year 2011

Idaho Department of Environmental Quality
U.S. Environmental Protection Agency, Region 10

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Water Quality Division Environmental Performance Partnership Agreement

The following Performance Partnership Agreement (PPA) between the U.S. Environmental Protection Agency (EPA) Region 10 and the Idaho Department of Environmental Quality (DEQ) will serve as the work plan for DEQ's Water Quality Division. It is effective for Calendar Year (CY) 2011 and covers the period of January 1 through December 31, 2011. This agreement aligns DEQ and EPA Region 10 priorities and defines expected environmental outcomes. Through this agreement, federal and state agencies can work together more efficiently in managing water resources in Idaho.



Toni Hardesty, Director
Idaho Department of Environmental Quality

12/16/10
Date



Dennis McLerran, Regional Administrator
U.S. Environmental Protection Agency, Region 10

12/21/10
Date

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INTRODUCTION

The U.S. Environmental Protection Agency (EPA) and the states share responsibility for environmental protection. This Performance Partnership Agreement (PPA) describes how the Idaho Department of Environmental Quality (DEQ) Water Quality Division and EPA Region 10 will work together to protect Idaho's water quality.

The goal of a PPA is to bring more flexibility, accountability, and innovation into the state and federal relationship. In particular, these agreements are intended to increase environmental protection by focusing on overall environmental goals and results of government programs. In the PPA process, DEQ and EPA discuss environmental conditions and program needs, agree on priorities, develop approaches to address priorities, determine roles and responsibilities, and choose program measures.

This agreement details how DEQ and EPA will work together to accomplish common water quality goals. The two agencies will continue to focus on integrating key program areas that form the foundation of the water quality program in Idaho. Core programs include safe drinking water, ground water, water quality standards, water quality monitoring and assessment, water body and watershed restoration, wastewater and drinking water infrastructure, and National Pollution Discharge Elimination System (NPDES) permits and compliance. DEQ is the lead agency for most of these programs, except for NPDES for which EPA is the lead. Each water quality program component identifies the expected environmental results as well as the DEQ and EPA work commitments to be completed during CY 2011.

To present a comprehensive overview of DEQ's efforts to protect water quality, this PPA describes additional DEQ Water Quality Division activities funded by other federal and non-federal funds. In CY 2011, federal grant work plans will continue to focus on optimizing the use of DEQ Water Quality Division staff to perform more critical water quality work in-house.

Strategic Priorities

EPA and DEQ were guided in these PPA negotiations by their respective strategic plans and priorities. DEQ and EPA strategic plans are available for review on each agency's Web site. These strategic plans are broad-based and address more than just water quality strategies and priorities. Figure 1 illustrates the relationship of DEQ and EPA planning processes, including strategic priorities, to the PPA. The PPA offers an opportunity to identify common ground among these priorities and for the agencies to identify opportunities to work collaboratively on some priorities. The following sections describe each agency's strategic priorities. These sets of priorities establish the framework for development of this PPA. Specifically, this PPA incorporates EPA's priorities and targets that correspond to DEQ's priorities and objectives.

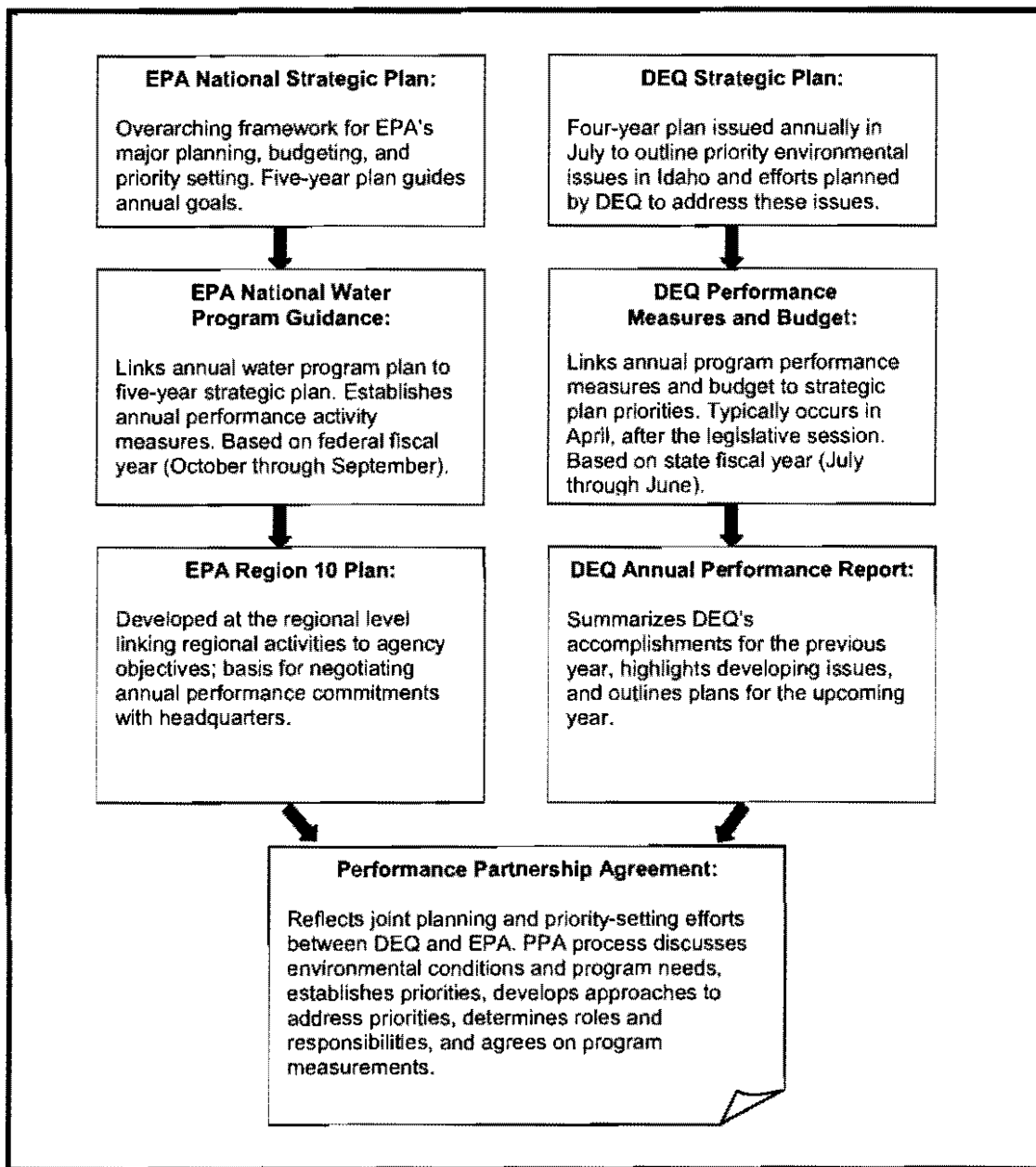


Figure 1. Relationship of DEQ and EPA planning processes to the PPA.

DEQ's Strategic Priorities

DEQ has adopted a strategic plan for 2011 through 2014, and it is available at <http://www.deq.idaho.gov/about/publications.cfm>. DEQ's mission is to protect human health and preserve the quality of Idaho's air, land, and water for use and enjoyment today and in the future. DEQ uses environmental outcomes as one method to evaluate the effectiveness of its programs. Specific Water Quality Division objectives include the following:

- Improve ground water quality in identified degraded areas and protect all ground water.
- Improve surface water quality in areas identified as not supporting their beneficial uses or where the state believes threatened or endangered species exist.
- Protect public health by maintaining or improving the quality of Idaho's drinking water.
- Promote watershed-based solutions and emphasize coordination, collaboration, and sharing of expertise across programs in recognizing the entire watershed as one system.
- Encourage environmentally friendly and protective reuse of wastewater.

EPA's Strategic Priorities

The EPA National Water Program Guidance provides an overarching document of national goals, priorities, and performance measures aimed at making significant progress toward protecting human health and improving water quality. This national program guidance is augmented by the National Program Manager (NPM) Guidance for enforcement activities in all media. The NPM Guidance for Water similarly lays out expectations for water activities.

The EPA FY2011 - 2015 Strategic Plan, available at <http://www.epa.gov/aboutepa/>, captures national goals and describes priorities, strategies, and expectations. EPA Region 10 strives to integrate state and regional priorities with EPA's national strategic planning objectives. The 2007-2011 Strategy for Region 10 is available at <http://www.epa.gov/r10earth/>. Region 10 is currently revising its strategy to align with the EPA Administrator's seven national priorities. The revision is anticipated to be completed in early 2011.

The most current Region 10 strategy identifies six strategic priorities, two of which are directly related to this PPA: Protecting and Restoring Watersheds and Sustainability and Strategic Partnerships. Both priorities have several work activities pertaining to water quality. EPA's commitment to continuous improvement in the Idaho PPA process is articulated in the Sustainability and Strategic Partnership priority. EPA Region 10 has identified the following priorities specific to Idaho water quality for 2011:

- Work with DEQ and other partners to complete the American Falls nutrient total maximum daily loads (TMDL) so that EPA can proceed with revisions for expired NPDES permits.
- Work with DEQ and Washington Department of Ecology to implement the Spokane River TMDL, including permit revisions necessary for Idaho dischargers.
- Issue draft NPDES nutrient permits for the Boise River.
- Work with DEQ to begin implementation of the eight activities under the EPA Region 10 mercury strategy.

- Implement the National Confined Animal Feeding Operation (CAFO) Rule revision by issuing the Idaho General Permit for CAFOs, and work with DEQ and Idaho Department of Agriculture to effectively coordinate federal and state program implementation.
- Partner with DEQ to identify and promote sustainable infrastructure projects in Idaho.
- Partner with DEQ to restore funding for the surface water ambient monitoring program.

GENERAL WATER QUALITY AGREEMENTS

Information and Document Sharing Expectations

DEQ will submit annual reports to EPA that provide data on the measures indicated in the PPA, unless this information is provided in grant reports. DEQ and EPA will inform each other regarding correspondence about grants, agreements, or products or services rendered from other local, state, and federal agencies or private entities that concern activities covered under this agreement.

Training and Technical Assistance

Each agency, within its resource limitations, will provide training and technical assistance to the other agency upon request.

Joint Evaluation of Performance

Unless stipulated otherwise in the PPA or individual grant conditions, DEQ and EPA will perform semiannual reviews for all PPA commitments. These reviews will occur approximately mid-year in May 2011 and near the conclusion of the annual PPA. This joint evaluation of performance will discuss program accomplishments as measured against work plan commitments, existing and potential problem areas, and suggestions for improvement. As a result of these performance evaluations, DEQ and EPA will collaborate on preparing brief progress reports covering their respective commitments in the PPA.

Roles and Responsibilities

Roles and responsibilities for EPA and DEQ are specified at the Program Commitment level in this PPA.

Terms and Conditions

DEQ and EPA will follow all terms and conditions outlined in operating agreements, yearly grant agreements, and federal and state statutes and regulations. For the purposes of quantification of effort, 2,080 person hours is one "full-time equivalent" (FTE), also known as one "work year." As required by 40 CFR Part 35, the following federal sources of funding have been identified in this PPA:

- | | |
|-------------------------------|--|
| • <i>Surface Water 106</i> | Wastewater Reuse; NPDES Inspections/Capacity Development/Certifications; Wastewater Plan/Specs; Monitoring Initiatives |
| • <i>Ground Water 106</i> | Ground Water Program Related Activities |
| • <i>Non-point Source 319</i> | TMDL; NPS; Restoration and Management Plans |
| • <i>604(b) / 205(j)</i> | Wellhead Protection; On-site Wastewater Program |

- | | |
|--|--|
| • <i>TMDL Grant</i> | Key Watershed TMDL Projects |
| • <i>STAG Admin 3%</i> | Public Works Construction Oversight |
| • <i>Drinking Water PWSS</i> | Drinking Water Program Administration |
| • <i>Drinking Water SRF Capitalization Grant</i> | Drinking Water Loans; Loan Program Administration; and Eligible Set-aside Activities |
| • <i>Clean Water SRF Capitalization Grant</i> | Wastewater Loans and Loan Program Administration |
| • <i>American Recovery and Reinvestment</i> | Drinking Water/Wastewater Loan Program; Water Management Planning |

Outcomes

Environmental outcomes are described in the individual program sections.

COMPONENT 1. SURFACE WATER ASSESSMENT AND PROTECTION PROGRAMS

Program Goal

The goal of the DEQ Surface Water Program is to restore impaired water bodies to conditions supporting designated and existing beneficial uses. DEQ also works to improve surface water quality in areas with endangered species issues. These goals are accomplished through the following activities: monitoring and data collection, assessment, Integrated Report publication (formerly called the 305(b) report and 303(d) list), water quality standards development, and TMDL development. Monitoring and data collection will likely remain static in calendar year 2011 in comparison to calendar year 2010. However, DEQ has developed a draft budget to restore ambient water quality monitoring to calendar year 2008 levels.

Activities

Where possible, complete remaining TMDLs per the 2002 Idaho TMDL Settlement Agreement. Continue monitoring and assessment activities as budget allows; develop water quality standards. Submit 2010 Integrated Report (IR).

Program Contacts

David Croxton, EPA (206) 553-6694

Jannine Jennings, EPA (206) 553-2724

Michael McIntyre, DEQ (208) 373-0570

Program Commitments

Priorities

- Complete the following TMDLs in CY 2011:

Big Lost (17040218)

Lemhi (17060204)

Bear River (16010102, 16010201, 16010202, 16010204)

American Falls Reservoir (17040206SK001L_0L)

Indian Creek (170950114SW001_04/06)

Black Lake (17010303PN009L-0L Tribal)

Lake Lowell (17040114SW004_06)

Lolo (17060306)

Tammany Creek (17060103SL016_02 Tribal)

Hatwai Creek (17060306CL067_02/03)

Lochsa (17060303)

Lake Walcott (17040210)

N. Fork Coeur d'Alene (17010301)

Coeur d'Alene Tributaries

- See attachment D and E of 2010 IR for schedule and priority ranking of remaining Assessment Units requiring TMDLs pursuant to the 2002 Idaho TMDL Settlement Agreement.
- Develop implementation plans and, as budget allows, implement approved TMDLs with designated management agencies.
- Complete 5-year reviews currently underway.
- Coordinate monitoring activities with other state, federal, and private entities. Provide necessary information, including monitoring data, to demonstrate meeting EPA National Measures (e.g., SP-10 and SP-12).
- Continue to update and modify water quality standards as needed.

Outcomes

An increased percentage of waters supporting beneficial uses and a decreased percentage of waters that do not support beneficial uses that have been addressed by TMDLs.

Total Maximum Daily Loads (TMDLS)

1.1 Restore beneficial uses and meet water quality standards in water quality limited water bodies.

Approach

Complete remaining subbasin assessments and TMDLs pursuant to the 2002 Idaho TMDL Settlement Agreement. See Outputs item (a) below.

Outputs

a. Complete the following TMDLs in CY 2011:

Big Lost (17040218)

Lemhi (17060204)

Bear River (16010102, 16010201, 16010202, 16010204)

American Falls Reservoir (17040206SK001L_0L)

Indian Creek (170950114SW001_04/06)

Black Lake (17010303PN009L-0L Tribal)

Lake Lowell (17040114SW004_06)

Lolo (17060306)

Tammany Creek (17060103SL016_02 Tribal)

Hatwai Creek (17060306CL067_02/03)

Lochsa (17060303)

Lake Walcott (17040210)

N. Fork Coeur d'Alene (17010301)

Bruneau (temperature only)

Upper Snake Rock (temperature only)

Coeur d'Alene Lake Tributaries

- b. See attachment D and E of 2010 IR for schedule and priority ranking of remaining Assessment Units requiring TMDLs pursuant to the 2002 Idaho TMDL Settlement Agreement for schedule and priority.
- c. Commit to work on Spokane River Pollutant Trading Framework. Partial funding for this effort will come from EPA's one-time 106 grant (\$42,000).
- d. Submit TSS TMDL modification for Mid-Snake (17040211).
- e. Share pre-public comment period drafts of TMDLs with EPA.
- f. Share draft of the TMDL data entry form with EPA prior to final TMDL submittal.
- g. Continue to cooperate with the Tribe and EPA on the finalization and issuance of the Black Lake TMDL.
- h. Continue to perform pre- and post-TMDL monitoring visits, as budget allows, to support TMDL development and adaptive management.
- i. Continue to work collaboratively with EPA on the Snake River – Salmon River to Washington state line TMDL (17060103). This TMDL is a joint effort by EPA and states in conjunction with the Columbia Main Stem Temperature TMDL. Final completion date is unknown at this time due to scope and complexity.
- j. Develop TMDLs for listed pollutants on Lower Boise Tributaries (17050114) and work with the Lower Boise River Watershed Advisory Group to obtain a recommendation to develop a nutrient TMDL for the Lower Boise River. If advised to develop a nutrient TMDL, DEQ will initiate a nutrient subbasin assessment (SBA) and begin preparing a nutrient TMDL.
- k. Complete draft total phosphorous SBA for Mid-Snake River.

Schedule

Subbasin assessment and TMDL completion follows an agreed-upon schedule (per item 1.1b).

Funding

These activities are funded by state monies appropriated through the Idaho Legislature. Presently, DEQ devotes approximately 44,808 person hours (approximately 21.5 work years) and \$154,000 in operating funds to support this effort. Successful achievement of these activities will depend on additional funding and collaborative efforts with other agencies. TMDL implementation plan development efforts conducted by DEQ staff are funded by state general funds and some federal 319 funds.

Contacts

David Croxton, EPA (206) 553-6694

Michael McIntyre, DEQ (208) 373-0570

Monitoring, Assessment, and Designation

1.2 Assess monitoring data for beneficial use status.

Approach

Submit final 2010 IR to EPA. Continue to develop and maintain capacity for reporting 305(b) information in the IR. Continue electronic reporting of IRs using EPA's assessment database. Develop a plan for next installment of EPA monitoring initiative funding (\$169,000). Conduct wetland surveys as part of National Wetland Condition Assessment (NWCA), a national probabilistic survey of wetland condition that will take place in 2011. With funds from 104(b)3 Wetland Program Development Grant, increase the number of wetland survey sites and evaluate several survey protocols. This intensification study in conjunction with the NWCA will demonstrate the use of wetland monitoring data to evaluate and report trends in wetland areas and conditions for specific watersheds and other local planning areas.

Outputs

- a. Continue participation in NWCA by monitoring 13 assigned sites for 2011 field season (\$75,400, 106 Grant).
- b. Plan and implement monitoring at 15 additional wetland sites as part of the Wetland Program Development Grant for 2011 field season (\$57,970).
- c. Draft a Lakes Monitoring Methods document and use to sample a number of lakes during the 2011 field season. Evaluate results and finalize methodology. Complete work under the EPA Monitoring Strategies Grant. (\$174,000).
- d. Implement 3 to 6 Beneficial Use Reconnaissance Plan (ambient monitoring) crews during the 2011 field season using \$42,000 of one-time EPA 106 funds along with approximately \$100,000 of state funds (dependent on legislative approval of Decision Unit seeking restoration of BURP state funding).
- e. Develop a plan for revising Idaho Ambient Monitoring Plan. Share with EPA. Look at timelines for completing.
- f. Share Tetra Tech's revised Idaho Ecological Frameworks for streams and rivers with EPA.

- g. Identify at least ten 6th field (12 digits) HUC watersheds listed as impaired in the 2002 IR where watershed approaches are likely to result in significantly improved water quality by 2012. Report on successes as progress is demonstrable.
- h. Assist in identifying water quality improvements meeting EPA National Measures (SP-10, SP-12, WQ-21).

Schedule

Scheduling and logistics will be key to successfully completing four monitoring projects in CY 2011.

Funding

DEQ estimates approximately 12,670 person hours (equivalent to 6.1 work years) and \$14,094 in operating funds to support this effort in this PPA cycle. Funding source are state general fund dollars, EPA National Wetland Condition Assessment, 106 and 104(b)3 grants.

Contacts

Gretchen Hayslip, EPA (206) 553-1685

Mary Anne Thiesing, EPA (206) 553-6114

David Croxton, EPA (206) 553-6694

Michael McIntyre, DEQ (208) 373-0570

Water Quality Standards (WQS)

1.3 Develop scientifically based functional WQS to address program needs and to ensure protection of Idaho water.

Approach

DEQ and EPA will work collaboratively to develop revised WQS and implementation guidance. DEQ will request applicant status, participate in Endangered Species Act (ESA) consultations, and submit rulemaking dockets approved by the Idaho Legislature for EPA action. EPA will review and consult on submittals of revisions to Idaho WQS.

Outputs

- a. Finalize antidegradation implementation rule and accompanying guidance for the 2011 Legislature.
- b. Prepare antidegradation docket for EPA approval.
- c. Initiate rulemaking for selenium site-specific criterion for selected waters in southeast Idaho and site-specific temperature criterion for Chinook spawning on the Snake River below Hells Canyon Dam.
- d. Provide EPA with a list of prioritized Triennial Review topics.
- e. Provide EPA with an additional list of other possible WQS updates/revisions that could be undertaken subject to resource availability and priority changes.
- f. Finalize and issue Mixing Zone Guidance. Discuss mixing zone issues that were not retained in the final guidance.

- g. Work with EPA in 2011 on human health criteria review for Idaho (response to Oregon human health criteria action).

Schedule

DEQ anticipates the items listed above will be completed and submitted to EPA by December 31, 2011, unless otherwise specified.

Funding

These activities are to be funded by monies appropriated through the Idaho Legislature. DEQ estimates approximately 8,376 person hours (equivalent to 4 work years) and \$13,603 in operating funds to support this effort. Achievement of future goals will depend on additional funding and collaborative efforts with other agencies.

Contacts

Jannine Jennings, EPA (206) 553-2724

Michael Lidgard, EPA (206) 553-1755 (re: mixing zone analyses, §401 certification)

Michael McIntyre, DEQ (208) 373-0570

1.4 Component Commitments

DEQ Commitments

Refer to Sections 1.1, 1.2, and 1.3 above regarding TMDL, monitoring and assessment, and water quality standards activities.

- a. Use EPA one-time 106 funds to conduct monitoring during the 2011 field season (\$42,000) and to support Pollutant Trading in the Spokane River (\$42,000).
- b. Continue leading the selenium site-specific criteria development workgroup.
- c. Continue dialog with EPA on inclusion of Idaho mercury fish tissue criterion in NPDES permits and TMDLs.
- d. Share pre-public comment period drafts of TMDLs.

DEQ and EPA Commitments

- a. Communicate at least quarterly by conference call on progress of water quality standards submittal and approval actions, TMDLs, Integrated Report, ambient monitoring, and PPA commitments.
- b. Strengthen working relationship on an ongoing basis.
- c. Seek additional state and federal funding for surface water protection activities, as may be available, including additional resources for monitoring and the Ambient Monitoring Plan. DEQ and EPA will discuss the status of ambient monitoring at the mid-year review and identify next steps and continue conversation on an as-needed basis.
- d. Both EPA and DEQ will make appropriate staff assignments to each TMDL.
- e. Report overall Surface Water Program progress semiannually regarding submittal and approval actions, TMDLs, and the Integrated Report.
- f. Coordinate review and selection of nonpoint source projects and activities directed to priority watersheds, taking into account multiple available funding sources.

- g. Continue support of the watershed approach, utilizing basin monitoring efforts, state program integration, and storm water planning to emphasize nonpoint source program results.

EPA Commitments

- a. Finalize Clearwater TMDL (1060303) with the Nez Perce Tribe.
- b. Continue to support DEQ antidegradation rule through Board and legislative processes. Participate early and to the extent possible in high-priority rulemaking proceedings negotiated by DEQ for water quality standards.
- c. Continue EPA participation (reviewing technical documents and providing comments) in DEQ's workgroup on site-specific fish tissue selenium criteria development.
- d. Approve or disapprove all TMDLs submitted by DEQ on a timely basis.
- e. Act on the current IR within statutory time frames.
- f. Continue to review and act, and provide Idaho TMDL Settlement Agreement parties with copies of TMDLs and corresponding action letters on a timely basis.
- g. Improve coordination of NPDES permitting with DEQ mixing zone authorization and TMDL completion.
- h. Continue EPA technical support to DEQ for mercury TMDL development.
- i. Offer technical support, training, and planning assistance for the wetland survey project.

COMPONENT 2. WATERSHED PROTECTION PROGRAM

2.1 Manage §319/NPS Program

Approach

Implement the §319 Nonpoint Source (NPS) Program through the EPA-approved Idaho 2000 NPS Management Plan and the 2004 EPA §319 guidance. The Idaho NPS Management plan is available at

http://www.deq.idaho.gov/water/data_reports/surface_water/nps/reports.cfm.

Outputs

- a. Successfully award and complete implementation project grants initiated under §319 contracts. These grants are contingent upon approved TMDLs or other water quality priorities and will be based on the amount of funding available. The §319 NPS Management Plan will be utilized as a guidance document for this activity.
- b. Administer grants in accordance with relevant grant conditions, including use of the Grant Reporting and Tracking System (GRTS) to report program activities on all mandatory elements, including estimated project load reductions (for nitrogen, phosphorus, and sediment as applicable). DEQ will enter all FY2010 GRTS project data prior to April 1, 2011.
- c. Complete and submit an annual report for the NPS Management Program and §319 grant.
- d. Update the NPS MOUs, as necessary.
- e. Perform §319 project reviews utilizing the NPS Management Plan as guidance. DEQ and EPA will continue to work together on process and documentation for use of §319 funds implementing the nine-element watershed-based plan (including qualifying TMDL plans) in impaired waters.
- f. With EPA assistance, work to identify and integrate outside funding with §319 funding to provide increased funding for implementation work in priority watersheds, per DEQ's Strategic Plan.
- g. As requested, help to identify potential "success stories" under EPA criteria. Success stories are the means by which to document national NPS program measure WQ-10 (if partial or full water body restoration achieved), or progress toward restoration (non-WQ-10). For those stories that qualify and with EPA's support, seek to develop a minimum of two WQ-10 success stories yearly. DEQ and EPA will continue to work together to assess and target monitoring needs to document NPS water quality improvements under the strategic program measures.
- h. Continue to develop a process to ensure that approvable 319-funded project work plans fully evaluate alternative designs or measures which best address the primary long-term water quality objectives of the proposal.

Schedule

Activities conducted under the §319/NPS Program will follow milestones identified in the §319/NPS grant work plan.

Funding

EPA funds approximately 60% of the §319/NPS Program, while 40% in matching funds comes from state and local monies. DEQ estimates approximately 7,262 person hours (approximately 3.49 work years) and approximately \$2,385,800 from the federal §319 grant to support §319 activities. DEQ and EPA acknowledge that ongoing effective implementation of the §319 Program is contingent on the ability of the state to meet match and ancillary grant requirements (e.g., monitoring) and on the ability of the ultimate subgrant recipients to meet match requirements. DEQ and EPA agree to work in partnership to flexibly meet and address such funding challenges.

EPA Commitments

EPA will work with DEQ to find the most expeditious mechanisms to utilize the state's full §319 allocation while minimizing the need for carryover funds between grants.

Contacts

Tim Wendland, DEQ (208) 373-0439

Rick Seaborne, EPA (206) 553-8510

Dave Pisarski, DEQ (208) 373-0464

COMPONENT 3. WASTEWATER PERMITTING PROGRAM

Program Goal

The goal of the Wastewater Permitting Program is to ensure wastewater is utilized in a manner that is protective of human health and the environment with respect to surface water and ground water. DEQ also supports the ultimate goal of the NPDES program by encouraging the elimination of pollutant discharges to waters of the United States.

Activities

Process wastewater reuse permits, perform compliance oversight of wastewater reuse permitted facilities, assist health districts in on-site wastewater permitting, develop program guidance materials, and ensure statewide consistency.

Program Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Lidgard, EPA, NPDES Unit (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

Program Commitments

Priorities

- Conduct 60 wastewater reuse permit inspections.
- Issue 25 protective wastewater reuse permits.
- Conduct timely review of annual reports.
- Participate in development of a National Sanitation Foundation testing protocol for subsurface drainfield products.

Outcome

A decrease in the number of wastewater facilities that discharge to waters of the U.S.

3.1 Process 25 wastewater reuse permits by December 31, 2011.

Approach

Priority will be given to new facilities, industrial facilities with expired permits, facilities with inadequate reuse permit limits, and facilities with the potential to impact impaired water bodies.

Outputs

- a. Issue wastewater reuse permits.

- b. Transmit to EPA on a semiannual basis a list of permits issued.

Schedule

DEQ will report on the number of wastewater reuse permits issued for January 1 – June 30, 2011, by July 31, 2011.

DEQ will transmit to EPA a list of all wastewater reuse permits issued in CY 2011 within 30 days of the end of the calendar year

Funding

State monies and federal (EPA) grants, including Surface Water 106, fund this activity. Staff in DEQ's State Office Water Quality Division and six DEQ regional offices will complete this activity.

Activity	Level of Effort
Wastewater Reuse Permitting	7.5 FTE

Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Lidgard, EPA, NPDES Unit (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

3.2 Provide compliance oversight of wastewater reuse permitted facilities.

Approach

Provide oversight of permits for compliance with permit conditions by conducting field inspections and reviewing annual reports. Perform enforcement and compliance actions as needed.

Outputs

- Complete 60 inspection reports.
- Complete 60 annual report reviews.
- Report progress semiannually on the number of inspections and annual report reviews completed.

Schedule

All performance measures will be met by the end of the calendar year.

Funding

This activity is funded by state funds and federal (EPA) grant monies, including Surface Water 106 funds. Staff in DEQ's Technical Services Division, State Office Water Quality Division, and six regional offices will complete this activity.

Activity	Level of Effort
Compliance Activities	4.0 FTE

Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Lidgard, EPA, NPDES Unit (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

3.3 Develop program guidance materials and ensure statewide consistency.

Approach

Staff in DEQ's State Office Water Quality Division will be responsible for developing materials for regional offices to use in implementing the wastewater reuse program in the field, including direction, guidance, and tracking systems. A guidance development workgroup, comprised of representatives of DEQ, stakeholders, consultants, and individuals, is currently revising the guidance. Higher priority items are being revised first. The effort is expected to be ongoing for several years.

Outputs

- a. Provide copies of the most current draft guidance semiannually, and final guidance once finalized.
- b. Provide wastewater reuse training to new and existing staff as funding is available.

Schedule

All performance measures will be met by the end of the calendar year.

Funding

This activity is funded by state funds and federal (EPA) grant monies, including Surface Water 106. Primarily staff in the State Office Water Quality Division will complete this activity with support from DEQ's Technical Services Division and the six regional offices.

Activity	Level of Effort
Develop guidance and ensure consistency	1.7 FTE

Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Lidgard, EPA, NPDES Unit (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

3.4 WQ 106 Grant Performance Measures – Provide annual performance measure report.

Approach

An annual performance measure report will be provided by DEQ to indicate progress in the elimination of pollutants from surface water by wastewater reuse activities.

Outputs

- a. Total gallons annually of wastewater with pollutants eliminated from discharge to surface water by reusing wastewater. Pounds of pollutants removed will also be provided if available for the following constituents: nitrogen, phosphorus, and chemical oxygen demand. A qualitative description will be provided for the various types of water reuse permits issued by DEQ to address public health risks.
- b. Total number of facilities that reuse wastewater, thereby reducing the number of new facilities requiring NPDES permits and reducing the backlog of expired and new NPDES permits issued by EPA.

Outcome

Overall surface water quality is improved by the reduction of pollutant discharges, ultimately contributing to the goal of the NPDES program to eliminate pollutant discharge.

Schedule

The annual performance measure report will be provided within 60 days after the end of the calendar year.

Funding

Funding for this activity consists of 208 person hours (0.1 work years) from Water Quality 106 funds.

Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Lidgard, EPA, NPDES Unit (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

**3.5 Manage the on-site wastewater program —
Revise the Technical Guidance Manual, assist the District Health Departments in issuing on-site permits, review large systems plans and specifications, and perform nutrient-pathogen studies.**

Approach

The DEQ State Office will provide guidance materials and overall management activities related to this program. The regional offices will be responsible for reviewing plans and specifications and ground water impact studies.

Outputs

- a. Revise the Technical Guidance Manual.
- b. Provide Health District training, audits, and program reviews.
- c. Review plans and specifications for large systems.
- d. Assist in the review of nutrient-pathogen studies.

Schedule

Activities will be completed on an as needed basis. Plans and specifications and nutrient pathogen studies will be completed within 42 days of submittal if possible.

Funding

Funding for this activity includes Water Quality 106 funds, federal (EPA) 604(b) grant, and state funds.

Activity	Level of Effort
On-site coordination, plan reviews, other guidance, and training	2.22 FTE

Contacts

Carla Fromm, EPA, Idaho Operations Office (208) 378-5755

Mike Lehner, EPA, Grants and Planning Unit, (206) 553-6349

Richard Huddleston, DEQ (208) 373-0561

David Hatt, DEQ (208) 373-0140

Maria Lopez, EPA, Idaho NPDES Liaison (208) 378-5616

3.6 Component Commitments

EPA Commitment

Encourage wastewater reuse where it is a preferable alternative to wastewater discharge to waters of the U.S.

Provide recommendations to DEQ on the best indicator organism to use in the reuse program for measuring risk to public health.

COMPONENT 4. GROUND WATER PROGRAM

Program Goal

The goals of the DEQ Ground Water Program are to protect and improve the quality of the state's ground water and ensure that existing and future beneficial uses including drinking water, agricultural, industrial, and aquaculture water supplies are met. All ground water is to be protected against contamination as a valuable public resource as per Idaho's Ground Water Quality Rule (IDAPA 58.01.11). The quality of degraded ground water is to be restored where feasible and appropriate to support designated beneficial uses.

Since October 2005, the Ground Water Program also coordinates voluntary activities to protect drinking water sources of public water systems.

Activities

- Coordinate all ground water and drinking water source protection related programs funded by EPA in Idaho, develop and implement Ground Water Quality Improvement Plans (formerly known as Ground Water Quality Management Plans) in priority areas of the state, develop guidance for interpretation of the Ground Water Quality Rule, and implement Idaho's source water protection strategies.
- Perform other activities related to the ground water program and drinking water source protection (rule interpretation and implementation, project and contract management, policy development and implementation, public education and outreach, regional/local ground water monitoring, source water assessments for new sources, and drinking water source protection plans and projects).

Program Contacts

Susan Ennes, EPA (206) 553-6249

Ed Hagan, DEQ (208) 373-0356

Program Commitments

Priorities

- Coordinate development of Ground Water Quality Improvement Plans that include strategies to address areas where ground water quality has been degraded by nitrate (Nitrate Priority Areas, known as NPAs). As of 2010, eleven plans had been developed. In CY 2011, DEQ will continue to develop plans and strategies for other NPAs such as Ashton, Lindsay Creek, Ada/Canyon, and Eagle/Star.
- Continue ground water monitoring in NPAs and other areas of concern throughout the state to determine the nature and extent of contamination, to set a baseline for effectiveness of best management practices (BMPs), and to evaluate ground water improvement activities.

- Implement the Ground Water Quality Rule and the Idaho Ground Water Quality Plan with other designated agencies through participation in the Idaho Ground Water Monitoring Technical Committee, the Idaho Department of Agriculture Ground Water Coordination Committee, and the Idaho Department of Water Resources Comprehensive Aquifer Management Plan (CAMP) committees.
- Populate the DEQ ground water quality database with new and historical ground water quality data. Continue refinements to the DEQ online mapping applications for the ground water quality database and technical reports to increase accessibility for the public.
- Participate in the recharge working group of the CAMP to promote protection of ground water quality while exploring aquifer recharge options to replenish water quantity.
- Promote adoption of BMPs for ground water protection and evaluate their effectiveness.
- Assist public drinking water systems with drinking water source protection efforts.
- Implement the drinking water source protection grant program.
- Provide education and outreach, including general ground water education to the public. Promote ground water BMPs to landowners and stakeholders, educate local governments of responsibilities for ground water protection, and assist with development of ordinances for ground water protection.

Outcomes

- Decreased nitrate concentration trends in aquifers located within designated NPAs implementing strategies and BMPs identified in Ground Water Quality Improvement Plans.
- Reduced number of wells within the NPAs with nitrate concentrations exceeding the ground water quality standard.
- Minimized risk to public health for populations served by community water systems through implementation of Idaho's drinking water source protection strategies.
- Increased availability of ground water quality data through online applications to increase public awareness of ground water quality and the importance of ground water protection.

Program Indicators

Number of improvement plans/strategies implemented in areas with degraded ground water quality, as well as percentages of community water systems and/or populations served by community water systems covered by drinking water source protection strategies.

4.1 Management, oversight, and administrative support for Ground Water Program and coordination with other ground water activities

Approach

DEQ will administer the Idaho Ground Water Program to ensure statewide consistency among the DEQ state office and regional offices.

Outputs – Management of Ground Water Program

- a. Develop annual work plan and budget for the GW106 grant.

- b. Coordinate GW106 grant and PPA activities with regional offices during development of their annual work plans and budgets.
- c. Coordinate with EPA to develop the ground water tasks and language in the 2011 PPA.
- d. Coordinate GW106 grant activities with DEQ programs that regulate activities impacting ground water such as wastewater reuse, Brownfields projects, and ground water remediation projects.
- e. Conduct monthly program conference calls with DEQ regional office ground water program staff and DEQ technical services personnel.
- f. Organize and conduct Ground Water Program meetings.
- g. Organize and coordinate training for program staff as needed.
- h. Develop mid-year and annual GW106 grant and PPA reports.
- i. Revise/develop the ground water portion of DEQ's Strategic Plan.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of the state office program manager, regional managers, administrative support, and regional technical leads. The projected level of effort for this activity is estimated to be 1.0 work year (of which approximately 0.5 work years is funded from the federal GW 106 Grant). State general funds will fund 0.5 work years of effort.

Schedule

Quarterly coordination calls and semiannual grant reporting calls with EPA.

Contacts

Susan Ennes, EPA (206) 553-6249

Ed Hagan, DEQ (208) 373-0356

4.2 Coordinate ground water implementation strategies for a comprehensive program with state and federal agency partners.

DEQ will coordinate activities with other agencies for protection of ground water.

Outputs – Interagency Coordination

- a. Chair the Ground Water Monitoring Technical Committee.
- b. Participate in interagency coordination efforts as needed to fulfill DEQ's obligations as required by statute and the Idaho Ground Water Quality Plan. Existing committees in which DEQ participates include Agricultural Ground Water Coordination Committee, Idaho Ground Water Education Committee, and Idaho Pesticide Management Plan Rule Advisory Group.
- c. Implement the 2008 Idaho Ground Water Protection Interagency Cooperative Agreement and other existing cooperative agreements.

Schedule

Ground Water Monitoring Technical Committee meetings are held every three to four months.

Other interagency meetings occur on a semiannual to annual frequency.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of the state office program manager and staff, regional managers, and regional technical leads. The projected level of effort for this activity is estimated to be 0.5 work years (of which approximately 0.3 work years is funded from the federal GW 106 Grant). State general funds will fund 0.2 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Ed Hagan, DEQ (208) 373-0250

4.3. Interpret and implement Ground Water Quality Rule, develop guidance, and develop policy.

Approach

Continue implementation of the Idaho Ground Water Quality Plan. Coordinate Ground Water Quality Rule interpretation and implementation with DEQ regional offices and state office.

Outputs

- a. Develop guidance for interpretation of the Ground Water Quality Rule as needed. Provide copies of completed guidance documents to EPA.
- b. Continue to provide technical support for implementation and enforcement of the Ground Water Quality Rule to DEQ staff in other programs and in the regional offices. Provide assistance to the general public and regulated community on an as-needed basis.
- c. Continue work on guidance to determine points of compliance for the recently revised mining section of the Ground Water Quality Rule.
- d. Continue to develop protocols for ground water monitoring activities not covered in the DEQ Quality Assurance Plan. Protocols include criteria for monitoring site selection, site documentation, and data delivery to the Idaho Environmental Data Management System. Protocols will be shared with other agencies.

Schedule

Final outputs are scheduled for December 31, 2011, and may be subject to change, depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of the state office program manager and staff and, to a lesser extent, regional technical leads. The projected level of effort for this activity is estimated to be 1.5 work years (of which approximately 0.5 work years is funded from the federal GW 106 Grant). State general funds will fund 1.0 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Ed Hagan, DEQ (208) 373-0356

4.4 Implement ground water quality improvement activities, including improvement plans, in priority areas of the state.

Approach

DEQ will work with the public and relevant agencies in the area to develop ground water quality improvement strategies. DEQ and other agencies will examine ongoing and planned activities in priority areas to determine if they can be incorporated into a final restoration strategy. When appropriate, DEQ may request formation of an advisory committee or may utilize an existing advisory group to provide a recommendation regarding development of management strategies.

Outputs

Ground Water Quality Improvement Plans (GWQIPs) that are consistent with the Idaho Ground Water Quality Plan, the Idaho Ground Water Quality Rule, and DEQ Policy 004, and contain effective strategies for restoration of degraded areas.

- a. Provide support to advisory groups of the following completed ground water quality improvement plan areas:
 1. Twin Falls (including a 5-year review)
 2. Camas Prairie
 3. Cassia County
 4. Weiser
 5. Lower Boise/Canyon County
 6. Bruneau
 7. Grand View
 8. Bliss
 9. Minidoka
 10. Marsing
 11. Homedale
- c. Continue development of GWQIPs in the following nitrate priority areas:
 1. Ashton
 2. Lindsay Creek

3. Eagle/Star
4. Ada/Canyon

Schedule

The Lewiston, Twin Falls, Idaho Falls, and Boise regional offices are currently working with GWQIP committees in their regions. The schedule for final plan development is predicated upon level of local interest and involvement of the anticipated committees. Final outputs are scheduled for CY2011 and may be subject to change, depending on allocation of state resources and priorities.

Funding

This activity will be funded with state funds. DEQ staff working on this activity will consist of regional managers and regional technical leads. The projected level of effort for this activity is estimated to be 1.5 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Toni Mitchell, DEQ (208) 373-0250

4.5 Conduct ground water quality monitoring projects and manage ground water quality data.

Approach

DEQ will work with the public and coordinate with relevant agencies in the area to develop and implement ground water quality monitoring studies. Ground water quality monitoring projects will be coordinated with existing projects underway by other agencies.

Outputs

- a. Conduct and coordinate ground water sampling events and projects that follow up on monitoring detections by Idaho Department of Water Resources (IDWR), Idaho State Department of Agriculture (ISDA), or public health districts. Follow-up ground water sampling events may also be initiated after public water system detections or on the basis of individual complaints or concerns.
- b. Develop and conduct local or regional monitoring projects as a result of follow-up monitoring activities, nutrient-pathogen (NP) validation projects, or aquifer protection activities.
- c. Continue to populate the DEQ ground water quality database with new and historical ground water quality data. Continue improvements to the database to increase efficiency of data entry. Continue improvements for the DEQ online mapping application to include greater constituent query capabilities and increased data download features.
- d. Prepare an annual report of all data collected with public funds during CY 2010.
- e. Compile nitrate results from ground water samples collected from 2010 to update the nitrate ground water quality GIS files. Data will be collected from ISDA, IDWR/U.S.

Geological Survey, DEQ public water system database (Safe Drinking Water Information System or SDWIS), and DEQ regional/local monitoring.

- f. Participate in the confined animal feeding operation (CAFO) site advisory team comprised of members of the ISDA, IDWR, and DEQ. The CAFO site advisory team provides suitability determinations for counties to use when considering conditional use or livestock confinement operation permits.
- g. Develop GIS coverage with locations and hydrogeologic parameters of proposed developments using on-site waste treatment systems in areas of ground water quality concerns.

Schedule

Projects are planned for CY 2011 in each of the six DEQ regions. Schedules for the projects vary from one event to multiple years. Final outputs are scheduled for CY 2011 and may be subject to change, depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of state office program staff and regional technical leads. The projected level of effort for this activity is estimated to be 2.0 work years (of which approximately 0.5 work years is funded from the federal GW 106 Grant). State general funds will fund 1.5 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Jessica Atlakson, DEQ (208) 373-0121

4.6 Manage and implement ground water quality protection strategies for managed recharge.

Approach

Continue management and implementation for Idaho's Ground Water Quality Program. Coordinate DEQ regional offices and other agencies with Ground Water Quality Rule interpretation and authorities under Section 600 of the Wastewater Rules (IDAPA 58.01.16) for land application of recharge water.

Outputs

- a. Continue to work with IDWR at several existing and proposed recharge sites to monitor ground water quality potentially impacted by proposed and active aquifer recharge activities.
- b. Participate in the Recharge Working Group of the Comprehensive Aquifer Management Plan (CAMP) Committee and other local aquifer working groups.
- c. Review and make recommendations for water quality monitoring plans for land application by recharge water projects. Continue to support development of managed recharge projects.
- d. Review and provide comments to IDWR on injection well permits related to aquifer recharge.

Schedule

Final outputs are scheduled for December 31, 2011, and may be subject to change depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of state office program staff, regional managers, administrative support, and regional technical leads. The projected level of effort for this activity is estimated to be 0.5 work years (of which approximately 0.3 work years is funded from the federal GW 106 Grant). State general funds will fund 0.2 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Toni Mitchell, DEQ (208) 373-0250

4.7 Conduct public education and outreach activities, provide staff training, and implement program.

Approach

Continue education and outreach activities to encourage voluntary implementation of ground water protection activities. Activities will be coordinated with other agencies such as ISDA and IDWR.

Outputs

- a. Provide informational presentations and technical assistance and respond to public information requests. An average of 15 such requests is anticipated each month.
- b. Conduct workshops and open houses and participate in fairs and other community events.
- c. Participate in water awareness activities geared toward elementary teachers and students.
- d. Promote adoption of BMPs for ground water protection and use of the field guide completed by the Soil and Water Conservation Commission for evaluating ground water BMP effectiveness.
- e. Promote use of online mapping applications for ground water quality database, technical reports, and NPAs. Direct public records requests for such data to online applications.

Schedule

Final outputs are scheduled for December 31, 2011, and may be subject to change depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water 106 funds and state funds. DEQ staff working on this activity will consist of state office program staff, regional managers, administrative support, and regional technical leads. The projected level of effort for this activity is estimated to be 1.5 work years (of which approximately 0.2 work years is funded from the federal GW 106 Grant). State general funds will fund 1.3 work years of effort.

Contacts

Susan Ennes, EPA (206) 553-6249

Ed Hagan, DEQ (208) 373-0356

4.8 Conduct source water protection activities.

Approach

DEQ will coordinate activities with other agencies, cities, and counties, as well as the Idaho Rural Water Association source water protection staff. DEQ will continue to conduct a drinking water source protection grant program and to sponsor and/or participate in regional source water protection educational outreach and training events.

Outputs

- a. Number of source water assessments completed for new sources
- b. Number of drinking water protection plans completed and/or recertified
- c. Number of drinking water protection projects completed
- d. Number of outreach or educational events

Note: DEQ will annually provide EPA a list of completed source water assessments and drinking water protection plans, an example of one completed drinking water protection project, and a list of completed projects for the year. DEQ will provide EPA with a summary of the status of the grant program that includes descriptions of new projects awarded funding as well as a review of grant accomplishments.

Funding

This activity will be funded by the EPA SRF Wellhead 10% Set Aside [1452(g)(2)] and CWA §319 funds. DEQ staff working on this activity will consist of program managers, administrative support, and technical lead persons estimated at a level of approximately 7.1 work years, which is funded by the SRF Well Head 10% set-aside.

Schedule

Final outputs scheduled for December 31, 2011.

Contacts

Susan Ennes, EPA (206) 553-6249

Amy Williams, DEQ (208) 373-0115

4.9 Component Commitments

DEQ and EPA Commitments

- a. Review ground water program progress on an annual basis. Also, provide updates on ground water projects during quarterly conference calls.
- b. Continue to improve, maintain, and protect the quality of ground water in Idaho and seek additional resources to implement actions to accomplish that goal.
- c. Continue coordination and communication across program boundaries.
- d. Focus resources in prioritized areas with significant ground water quality degradation.
- e. Continue to share strategies on successful BPM implementation to reduce nitrate concentrations in degraded ground water areas.
- f. Participate in the annual Western States/EPA Source Water/Ground Water Conference to share strategies with other groups for the management and protection of Idaho's ground water resources.

COMPONENT 5. NPDES PROGRAM

Program Goal

The goal of the National Pollutant Discharge Elimination System (NPDES) Program is to maintain or improve the waters of the United States, which include surface waters of the state, and eliminate pollutant discharge. EPA currently retains primacy for the NPDES Program in Idaho. EPA is responsible for issuing and enforcing all NPDES permits. DEQ is responsible for certifying compliance of all NPDES permits with water quality standards and performing a negotiated number of compliance inspections per year for EPA. DEQ conducts approximately 50 NPDES inspections per year. DEQ will continue to maintain capacity to perform tasks identified in the PPA.

Activities

- Perform NPDES compliance inspections.
- Review plans for wastewater facilities construction.
- Certify NPDES permits.
- Track and communicate NPDES-related enforcement actions with EPA.
- Maintain DEQ capacity to perform NPDES compliance inspections.
- Finalize Authorization Agreement between DEQ and EPA regarding issuance of EPA inspector credentials under the federal CWA.

Program Contacts

Michael Lidgard, EPA (206) 553-1755

Kimberly Ogle, EPA (206) 553-0955

Richard Huddleston, DEQ (208) 373-0561

Michael McIntyre, DEQ (208) 373-0570

Program Commitments

Program Priorities

- Complete approximately 50 quality assurance (QA) reviewed NPDES inspections in CY 2011.
- Complete 8 to 10 QA reviewed complaint response inspections as directed by EPA in CY 2011.
- EPA will provide DEQ a plan for CY 2010 - 2012 to issue NPDES permits, as well as an annual schedule for CY 2011.
- Utilize EPA's plan and DEQ policy to prepare 401 certifications.

- Finalize Authorization Agreement between DEQ and EPA regarding issuance of EPA inspector credentials.

Outcomes

- 50 QA reviewed NPDES compliance inspections completed.
- 8 to 10 QA reviewed NPDES complaint response inspections as directed by EPA.
- NPDES certifications performed in a timely manner.
- Training of DEQ inspectors to be credentialed completed as specified in EPA Order 3500.1.

5.1 NPDES Activities –

Perform NPDES inspections, certify NPDES permits, review plans and specifications for wastewater facilities construction, track sanitary sewer overflows (SSOs), and notify EPA of enforcement actions of interest.

Approach

To assist in improving waters of the United States, which include surface waters of the state, DEQ will perform compliance inspections for EPA, provide water quality certifications, and review plans and specifications for wastewater facilities construction.

Outputs

- a. Inspection List: EPA and DEQ will negotiate an enforcement confidential DEQ inspection list by November 15 each year. The enforcement confidential list will include the facility name, NPDES permit number, DEQ regional office conducting the inspection, and the quarter in which the inspection will occur.
- b. Perform inspections consistent with the negotiated annual inspection list. Copies of inspection reports be emailed to richard.huddleston@deq.idaho.gov as TRIM links, and either sent to Maria Lopez, EPA, Idaho Operations Office, 1435 N. Orchard Street, Boise, ID 83706, faxed to her attention at (208) 378-5744, or e-mailed to lopez.maria@epa.gov.
- c. Perform 8 to 10 complaint response inspections as needed, and submit reports and associated forms as required for all NPDES inspections.
- d. Provide comments on preliminary draft permits and draft 401 certifications as appropriate, and final 401 certifications for proposed final permits.
- e. Provide plan approval letters for wastewater facilities construction.
- f. Provide quarterly reports that include a list of inspections conducted and a list of inspection reports completed during the period. The lists shall include the facility name, permit number, report date, and inspection date. Quarterly reports shall be either sent to Maria Lopez, EPA, Idaho Operations Office, 1435 N. Orchard Street, Boise, ID 83706, faxed to her attention at (208) 378-5744, or e-mailed to lopez.maria@epa.gov.
- g. Notify EPA of Sanitary Sewer Overflows (SSOs) and enforcement actions of interest. Enforcement actions of interest include biosolids, septage, and unauthorized discharges from wastewater reuse sites to surface waters. Notification shall be either sent to Maria Lopez, EPA Region 10, 1435 N. Orchard St., Boise ID, faxed to her attention at (208) 378-5744, or e-mailed to lopez.maria@epa.gov.

- h. Prepare an annual SSO report. The report will include a list of all SSO events by NPDES permitted and unpermitted facilities, estimated volume, responsible party, receiving water (if any), and solutions. The annual report shall be either sent to Maria Lopez, EPA Region 10, 1435 N. Orchard St., Boise ID, faxed to her attention at (208) 378-5744, or e-mailed to lopez.maria@epa.gov, and emailed with a TRIM link to richard.huddleston@deq.idaho.gov.
- i. Conduct QA review of all NPDES inspections, including complaint response inspections, by a senior inspector or engineering manager.
- j. Work with EPA to obtain EPA credentials for Idaho inspectors that conduct inspections on EPA's behalf. This output will include ensuring that a credentialing agreement is in place by March 31, 2011, and a list of inspectors qualified to receive credentials is provided to EPA no later than May 1, 2011.

Schedule

Plans will be reviewed within 42 days, water quality 401 certifications issued within 60 days, NPDES compliance inspections conducted within the period scheduled, and NPDES compliance inspection reports completed within 60 days after inspections are completed and, if possible, within 30 days if no sampling is performed.

Funding

This activity will be funded by state and federal (EPA) grant monies, including Surface Water 106 funds. Staff in DEQ's Technical Services Division, State Office Water Quality Division, and six regional offices will complete this activity. The level of effort projected for this activity is 14,456 person hours (approximately 6.95 work years).

Activity	Level of Effort
NPDES inspections, SSO reporting, enforcement coordination, and 8 to 10 compliant response inspections.	2.0 FTE
Review wastewater plans	5.4 FTE
Certify permits	0.5 FTE

Contacts

Michael Lidgard, EPA (206) 553-1755

Kimberly Ogle, EPA (206) 553-0955

Richard Huddleston, DEQ (208) 373-0561

Michael McIntyre, DEQ (208) 373-0570

5.2 Coordinate biosolids, storm water, and capacity development activities.

Approach

Improve coordination of the storm water and biosolids programs with EPA, other state agencies, and the regulated community.

Outputs

- a. DEQ will continue to provide compliance assistance to EPA, particularly related to reissuance of the storm water construction general permit and assistance to local municipalities complying with MS4 NPDES permits.
- b. Dependent upon EPA sponsored training, DEQ will begin to develop inspection capabilities for other sectors during this PPA cycle. EPA will provide training as resources allow to DEQ inspectors.
- c. DEQ will review proposals for land application of biosolids and domestic septage and will approve or disapprove land application sites in accordance with state regulations.
- d. DEQ will revise and promote the DEQ Catalog of Storm Water BMPs as needed.
- e. DEQ will provide basic information and referrals on storm water issues.
- f. DEQ will maintain capacity development information/documentation.
- g. DEQ will provide draft and final 401 certifications as appropriate for MS4 storm water permits and statewide storm water general permits.

Schedule

Activities will be completed on an as-needed basis.

Funding

Activities are funded in part by a federal Water Quality 106 grant.

Activity	Level of Effort
Biosolids	0.3 FTE
Storm water	Not budgeted as separate line item

Contacts

Richard Huddleston, DEQ (208) 373-0561

Michael Le, EPA (206) 553-1099

Misha Vakoc, EPA (206) 553-6650

Kimberly Ogle, EPA (206) 553-0955

5.3 Component Commitments

EPA Commitments

- a. Provide technical assistance in biosolids issues.
- b. Work with DEQ to determine the annual NPDES compliance inspection schedule by November 15 annually.
- c. Implement its CY 2010 - 2012 operating plan to reduce the backlog of expired NPDES permits and issue permits to new sources. This plan, with the list of targeted permits, will be shared with DEQ and will be updated yearly so that DEQ can properly manage its 401 certification and mixing zone evaluation responsibilities. EPA will continue to strive to meet the regional goal of 30% backlog in Idaho.
- d. Provide a schedule of Phase 2 municipal separate storm sewer system (MS4) storm water, construction, and all other storm water-related permitting activities by January 2011.

DEQ Commitments

- a. Submit completed NPDES compliance inspection reports and complaint response inspection reports in a timely manner to Maria Lopez, EPA.
- b. On a quarterly basis, provide a report to Maria Lopez, EPA, summarizing inspections conducted.
- c. Complete NPDES draft permit reviews and 401 certifications.
- d. Review wastewater construction plans.
- e. Review proposals for land application of biosolids and domestic septage and approve or disapprove land application sites in accordance with state regulations.
- f. Assist EPA in implementing the Phase 2 MS4 Storm Water program in Idaho by providing input into permitting.
- g. Track SSOs and report to EPA on an annual basis.
- h. Communicate enforcement actions of interest with EPA.
- i. Establish NPDES credentialing program at DEQ.

COMPONENT 6. DRINKING WATER AND WASTEWATER LOAN PROGRAMS

Program Goal

Improve environmental protection and public health through construction, operation, maintenance, and management of drinking water and water pollution nonpoint source and point source treatment facilities.

Activities

- Manage the Drinking Water and Water Pollution Control Loan Programs.
- Fund Nonpoint Source projects.
- Manage the state grant programs for drinking water and wastewater projects.
- Manage projects funded through State and Tribal Assistance Grants (STAG).
- Conduct Operator Expense Reimbursement Grant Program.

Program Contacts

Rick Green, Drinking Water, EPA (206) 553-8504

Mike Lehner, Wastewater, EPA (206) 553-6349

Cyndi Grafe, STAG, EPA (208) 378-5771

William Chamberlain, EPA (206) 553-8515

Tim Wendland, DEQ (208) 373-0439

Don Lee, DEQ (208) 373-0289

Program Commitments

Program Priorities

- Issue 14 planning grants and \$40.1 million in loans to improve drinking water system infrastructure. DEQ currently has \$13.6 million of loan applications in process for SFY 2011.
- Issue 15 planning grants and \$47.1 million in loans to improve wastewater system infrastructure, and issue NPS loans for purposes that could include point source solutions to NPS problems and agricultural activities. Coordinate with §319 Nonpoint Source Program and TMDL Program. DEQ currently has \$26.2 million of loan applications in process for SFY 2011.
- Report on environmental and public health outcomes by completing an environmental or public health benefits evaluation for each project in EPA's environmental benefits system for the Clean Water State Revolving Fund (CWSRF) or public health benefits system for the Drinking Water State Revolving Fund (DWSRF), and make timely reports on American

Recovery and Reinvestment Act (ARRA) loan activity.

- Fully comply with ARRA requirements such as Davis-Bacon wage provisions, Buy American requirements, green infrastructure, and additional subsidization. Also comply with any such requirements that continue to apply to the “base” SRF programs.
- Establish legal and/or administrative framework to:
 - Facilitate 30-year repayments for CWSRF assistance.
 - Offer a “Tier II” State Environmental Review Process.
 - Clarify the criteria for the CWSRF disadvantaged community assistance program.
 - Sponsorship of nonpoint source projects through §212 point source loans.
 - Facility planning grants allow optional environmental assessments.
 - Strengthen the sustainability rating criteria for loans and planning grants.

6.1 Manage the Drinking Water and Wastewater Loan Programs.

Approach

For each loan program, execute loan commitments for at least an amount equal to that required and defined in federal statute. Maintain correct federal and state funding ratios by drawing federal funds for each loan program in the proper proportional amounts.

Outputs

- a. Negotiate loan agreements regarding projects listed on the Intended Use Plans in a timely manner for amounts consistent with federal requirements.
- b. Prepare annual reports for the CWSRF and the DWSRF.
- c. Gather and assess comments relating to Web-based loan handbooks. Make minor corrections to the handbooks on an ad hoc basis, while collecting substantive comments for a follow-up public comment period.
- d. Revise operating agreements for the Clean Water and Drinking Water SRFs.
- e. Support CWSRF administrative costs, planning efforts, and wastewater operator training efforts with CWSRF loan fee revenues.
- f. Implement a fee structure into DWSRF loans to support administrative costs and planning efforts.

Schedule

Loans are negotiated throughout the state fiscal year, which ends June 30. The Water Pollution Control and Drinking Water SRF Annual Reports are due 90 days after the end of the grant year.

Funding

This activity will be funded by the 4% administrative set-aside portion of both SRFs and one-time state funds. In SFY 2011, approximately 15,000 person hours (equivalent to 7.2 work years) will be budgeted to the SRFs. This includes State Office Water Quality Division, Technical Services Division, and regional office staff.

Contacts

Tim Wendland, DEQ (208) 373-0439

Rick Green, Drinking Water, EPA (206) 553-8504

Mike Lehner, Wastewater, EPA (206) 553-6349

6.2 Fund Nonpoint Source projects.

Outputs

A priority list for SFY 2011 was prepared and issued for public comment. The current priority list contains one NPS project (the City of Greenleaf).

Schedule

The Board of Environmental Quality approved the priority list on April 21, 2010.

Funding

DEQ staff time used for making NPS project loans will be charged against the 4% CWSRF set-aside for administration and state appropriation.

Contacts

Tim Wendland, DEQ (208) 373-0439

Mike Lehner, Wastewater, EPA (206) 553-6349

6.3 Conduct Planning Grant Programs for Drinking Water and Wastewater Projects.

Approach

Develop an annual wastewater and drinking water grant project priority list.

Outputs

- a. Compile priority lists of grant projects on April 21, 2010.
- b. Review applications from 29 potential applicants expected to submit grant applications during SFY 2011.
- c. Report DWSRF set-aside expenditures for this activity via the DWSRF program annual report.

Schedule

Grants are negotiated throughout the state fiscal year, which ends June 30, 2011.

Funding

Funding for grant programs staff is provided through the CWSRF and DWSRF fee revenues and DWSRF set-asides. 4,906 person hours (approximately 2.4 work years) statewide has been budgeted in SFY 2011.

Contact

Tim Wendland, DEQ (208) 373-0439

Rick Green, EPA (206) 553-8504

Mike Lehner, Wastewater, EPA (206) 553-6349

6.4 Manage STAG-funded projects.

Outputs

Process reimbursement requests, review change orders, conduct project inspections, and prepare closeout packages, as detailed in the 2003 STAG 205g grant award (scope of work) documents.

Funding

Funding for DEQ staff time for administration and oversight of these EPA wastewater and drinking water construction grant projects will come from the 3% set-aside monies in the respective grants awarded to DEQ. 2,120 person hours (approximately 1.02 work years) have been budgeted for these activities in SFY 2011.

Contacts

Tim Wendland, DEQ (208) 373-0439

Cyndi Grafe, EPA (208) 378-5771

6.5 Manage Operator Expense Reimbursement Program.

Outputs

Award and administer a contract for training operators of very small drinking water systems.

Develop new training workshops and distance learning opportunities.

Upgrade the lending library used by the contractor for statewide operator training.

Obtain a mobile trailer to be used as a wet lab for backflow assembly instruction.

Funding

Funding for DEQ staff will come from the administrative allowance in the grant. 250 person hours (approximately 0.12 work years) have been budgeted for SFY 2011.

Contacts

Don Lee, DEQ (208) 373-0289

William Chamberlain, EPA (206) 553-8515

6.6 Monitor Implementation of the DWSRF Disadvantaged Assistance Program.

Outputs

- a. Evaluate water and wastewater systems on the current and upcoming SRF priority lists to determine eligibility for disadvantaged assistance.
- b. Evaluate eligibility for disadvantaged assistance for water systems with which DEQ is currently negotiating arsenic compliance schedules.
- c. In the CWSRF and DWSRF Annual Reports, discuss projects that are eligible for disadvantaged assistance.

Funding

Funding for this evaluation will consist of 4% CWSRF and DWSRF Administration Set-Aside funds.

Contacts

Tim Wendland, DEQ (208) 373-0439

Rick Green, EPA (206) 553-8504

Mike Lehner, EPA (206) 553-6349

6.7 Component Commitments

DEQ Commitments

- a. Follow all terms and conditions outlined in the operating agreements, yearly capitalization grant agreements, federal statutes, regulations, and published national guidance and policies for both SRF loan programs.
- b. Submit annual SRF reports to EPA as required.
- c. Complete annual development, review, and modification of the Intended Use Plans for both SRF loan programs.
- d. Pursue a process for funding NPS loans (e.g., agricultural, storm water, and individual septic tanks).

EPA Commitments

- a. Conduct timely annual reviews and written reports of both SRF loan programs.
- b. Provide DEQ with advice and consultation as requested and updated program guidance from EPA Headquarters as it becomes available.
- c. Provide timely, informative, and accurate advice regarding SRF program implementation and development questions from DEQ.

COMPONENT 7. SAFE DRINKING WATER PROGRAM

Program Goal

The goal of the DEQ Safe Drinking Water Program is to assist and support public water systems to ensure the delivery of safe and reliable drinking water.

Objectives

1. Public water systems that are located, designed, constructed, operated, maintained, and protected to reliably meet drinking water health-based standards.
2. Public water systems serving drinking water that meets all health-based standards.

Primary Program Contacts

Lance Nielsen, DEQ (208) 373-0291

Marie Jennings, Unit Manager, EPA (206) 553-1893

Outcomes, Targets, and Activities

7.1 Public Health Outcomes/Indicators

- a. Successfully address statewide compliance issues through use of Electronic Tracking Tool (ETT) based on the new EPA Enforcement Response Policy (microbial, nitrate, lead, and chronic contaminants) for small, medium, and large drinking water systems.
- b. Absence of reported waterborne disease outbreaks.

7.2 Outcome and Output Targets

- Percent of "person months" (i.e., all persons served by community water systems over 12 months) during which community water systems provide drinking water that meets all applicable health-based drinking water standards. Target = 95%.

Note: The state acknowledges that EPA uses additional national performance measures for the safe drinking water program—OWW Subobjective 2.1.1, percent of the "population," and Strategic Target SP-1, percent of "CWSs". The state also receives EPA quarterly results updates for these performance measures. The state has chosen the percent of "person months" (i.e., Strategic Target SP-2) as its state reporting measure and indicator of safe drinking water served.

- Address or resolve 87 public water systems listed on the ETT list between July 2010 and June 2011. The ETT is based on the new EPA Enforcement Response Policy and provides a prioritized list of the specific systems to be addressed to ensure that the highest-priority systems are addressed first.

"Address" is a term used to identify a resolution to the problem or violation that consists of the system returning to compliance or the state taking formal enforcement action. Examples of what may constitute "address" are as follows: the contaminant no longer exceeds the maximum contaminant level in a specified period of time, monitoring is complete, a bilateral enforceable agreement has been entered into, or an administrative order or other civil/criminal action has been filed

7.3 Activities/Performance Measures

<p>Objective 1: Public water systems that are located, designed, constructed, operated, maintained, and protected to reliably meet drinking water health-based standards.</p>	<p>Objective 2: Public water systems serving drinking water that meets all health-based drinking water standards.</p>
<p>Performance measures for contamination prevention and supporting activities:</p> <ul style="list-style-type: none"> • Number of sanitary surveys completed • Percentage of public water systems with current sanitary surveys • Percentage of community water systems that have current sanitary surveys (3-year frequency except 5-year frequency for outstanding performers) • Number of plan and specification reviews processed in less than 42 days • Number of SDWIS compliance runs validated • Number of outreach products provided such as the Drinking Water Newsletter and drinking water related brochures • Percentage of annual drinking water fees collected 	<p>Performance measures for compliance indicators and supporting activities:</p> <ul style="list-style-type: none"> • Percentage of public water systems in significant compliance with health-based standards • Number of acute microbial and surface water treatment failure events resolved • Number of chemical maximum contaminant level events addressed • Percentage of systems with a consent order in compliance with the terms of their consent order • Number of public water systems in violation of health-based standards in excess of 8 months.)

Program Commitments

7.4 DEQ / EPA Drinking Water Partnership Commitments and Schedule

DEQ/EPA agree to:

- a. Coordinate at least twice per year to discuss the Enforcement Targeting Tool, compliance issues, and drinking water program performance issues. At least one of the meetings will be face-to-face.
- b. Meet annually face-to-face or via videoconference for mid-year review/ performance measure discussion (April).
- c. Meet annually face-to-face or via videoconference for annual review/ performance measure discussion (August-September).
- d. Adhere to the following priorities of rule implementation: 1) Total Coliform Rule, 2) Surface Water Treatment Rules, 3) nitrate, and 4) lead.
- e. Maintain collaboration on state laboratory certification.
- f. Cooperate and coordinate on issues related to the implementation of new rules.
- g. Cooperate to resolve data quality issues.

DEQ agrees to:

- a. Upload quarterly SDWIS/State data on time to EPA (unless dtf to xml transition makes this not possible).
- b. Provide EPA with semiannual performance measure reports in the format utilized by DEQ.
- c. Implement new rules on schedule.
- d. Provide written compliance summaries from quarterly compliance meetings to better illustrate the overall compliance picture.

EPA agrees to:

- a. Report quarterly via e-mail to DEQ regarding EPA performance measures and state results.
- b. Provide DEQ with a quarterly ERP/ETT list.
- c. Submit drinking water program requests for information and work tasks with and through the DEQ state program office only.
- d. Reduce administrative demands on the state by limiting reporting requirements to semiannual reports and obtaining necessary reports and information from SDWIS when possible.
- e. Attend Idaho Drinking Water Advisory Committee meetings via teleconference or in person.
- f. Continue to provide rule interpretation and assistance.
- g. Provide advance notification to the state on training opportunities.
- h. Continue to implement Unregulated Contaminant Monitoring Rule and update DEQ via e-mail on relevant issues.

- i. Participate in quarterly ERP/ETT meetings with DEQ and the Health Districts as time permits.

7.5 Safe Drinking Water Program Resources Matrix

ACTIVITIES :	PWSS Base Grant	DWSRF 2% Technical Assistance Set-Aside [1452(g)]	DWSRF Capacity Development Set-Aside [1452(k)]	PWSS 10% Set-Aside [1452(g)(2)]	Hours/FTEs
Report Data to EPA using SDWIS/State	X			X	10,189 hours/ 4.89 FTEs
Submit Primacy Applications for, and Implement Requirements of, New State Rules	X				5,935 hours/ 2.85 FTEs
Address Compliance for Surface Water Systems	X				400 hours/ 0.19 FTEs
Conduct Sanitary Surveys	X		X		7,589 hours/ 3.64 FTEs
Implement Capacity Development Strategy	X		X		1,630 hours/ 0.78 FTEs
Review Plans and Specifications	X	X			17,237 hours/ 8.28 FTEs
Provide Drinking Water Engineering Services and Support	X				700 hours/ 0.34 FTEs
Perform Drinking Water Primacy Core Activities (public education, fee assessments, health district contract management, laboratory certification program, consumer confidence reports, annual confidence reports, drinking water security, DW operating licenses).	X			X	24,842 hours/ 11.94 FTEs

Lance Nielsen, Drinking Water Program Manager 208-373-0291	Marie Jennings, Drinking Water Manager 206-553-1893
Don Lee, Field Services Supervisor 208-373-0289 (Drinking Water Liaison with DEQ and Health District Field Offices) Capacity Development Coordinator, Operator Licensing, Sanitary Surveys, Performance Measures, Security	William Chamberlain, Operator Certification, Capacity Development, AWOP 206-553-8515 Chan Pongkhamsing 206-553-1806 Idaho Security Project Officer, Chemical Rules
Jerri Henry, Rule/Policy and Compliance/Enforcement Supervisor 208-373-0471 Drinking water program rule lead, chem./rad, Ground Water Rule, Revised Total Coliform Rule , laboratory liaison, enforcement lead)	Eric Winiecki, Pivot Table, Compliance and Enforcement, Performance Measures, Homeland Security 206-553-6904
Tom Aucutt, Planning and Outreach Coordinator	Cyndi Grafe, Idaho Field Ops 208-378-5771 Idaho PWSS Project Officer and Revised Total Coliform Rule
Bryan Zibbell, Regulatory Specialist Enforcement, Lead and Copper Rule, Rads Rule	Rick Green, Grants and Loans 206-553-8504 DWSRF and Set-Asides Project Officer
Mike Piechowski, Technical Engineer 208-373-0274 Engineering Rule Specialist, Surface Water/DBP Rules Coordinator	Wendy Marshall, Microbial Rules, Disinfection Byproduct Rules, Lead and Copper, Consumer Confidence Rule 206-553-1890
Curtis Stoehr, SDWIS/State Coordinator 208-373-0542	Jane Schuster, SDWIS/Fed 206-553-1096

Joan Thomas, Administrative Assistant 208-373-0409	Margo Partridge, Unregulated Contaminant Monitoring Rule, Ground Water Rule 206-553-1389
	Chan Pongkhamsing 206-553-1806 Idaho Security Project Officer, Chemical Rules
	Fredianne Gray, Lab Certifications, Contaminant Candidate List, Nitrates, Radionuclides 360-753-9459

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